

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**  
**DOCKET NO. 2019-281-S**

IN RE:	)	<b>REPLY AFFIDAVIT OF LAUREN B.</b>
	)	<b>HUTSON IN SUPPORT OF MOTION</b>
Application of Palmetto Utilities, Inc. for	)	<b>TO STRIKE PORTIONS OF THE</b>
adjustment of rates and charges for, and	)	<b>PRE-FILED DIRECT TESTIMONY</b>
modification to certain terms and conditions	)	<b>AND EXHIBITS OF CHARLES E.</b>
related to the provision of sewer service.	)	<b>LOY AND FOR IMPOSITION OF</b>
	)	<b>SANCTIONS</b>

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Personally appeared before me, Lauren B. Hutson who, being duly sworn, affirms and swears as follows:


1. I am in excess of eighteen years of age and competent to give this affidavit.
2. I am the same Lauren B. Hutson who has previously submitted an affidavit to the Commission in support of the June 5 motion of Palmetto Utilities, Inc., which I will refer to as "PUI" or "Company," in the above-captioned proceeding.
3. In connection with the above-captioned proceeding, I received from ORS on February 13, 2020, Water Operations Request Number 20, a copy of which is attached hereto as Exhibit 1.
4. After reviewing this document, I contacted the Company's counsel, John M. S. Hoefer, Esquire, on that same day and inquired whether it constituted a proper demand for books, records and information of PUI. Mr. Hoefer informed me that, in his opinion, it did not constitute a proper demand.
5. Subsequently, Mr. Hoefer informed me that in conversation with ORS counsel Jeff Nelson, Water Operations Request Number 20 had been withdrawn.

6. Following the February 19, 2020, meeting I attended at ORS with Mr. Hoefer and others, I asked Mr. Hoefer to confirm to me again that Water Operations Request Number 20 had been withdrawn and he did so.

7. As the person responsible for transmitting the Company's responses to ORS's requests for the production of books, records and other information pursuant to S.C. Code §58-4-55, I am aware that the Company has never responded to Water Operations Request Number 20.

PURSUANT TO SECTION (c)(16) OF ORDER 2020-04-03-01 OF THE SOUTH CAROLINA SUPREME COURT AND COMMISSION ORDER 202-391, I CERTIFY THAT THE FOREGOING STATEMENTS MADE BY ME ARE TRUE. I AM AWARE THAT IF ANY OF THE FOREGOING STATEMENTS MADE BY ME ARE WILLFULLY FALSE, I AM SUBJECT TO PUNISHMENT BY CONTEMPT.

FURTHER AFFIANT SAYETH NAUGHT.



Lauren B. Hutson

Dated this 16th day of June, 2020

Columbia, South Carolina

WATER OPERATIONS REQUEST #20

Exhibit 1



**ORS WATER OPERATIONS REQUEST FORM**

**Please acknowledge receipt of request by email.**

**DATE:** February 13, 2020

**TO:** Mark Daday/Lauren Hutson

**UTILITY:** Palmetto Utilities, Inc. – Docket No. 2019-281-S

**FROM:** Daniel Hunnell II

**PURPOSE:** Tariff Change – Limitation of Liability

**REQUEST THE FOLLOWING ITEMS BE PROVIDED BY:** February 20, 2020 or sooner

Please provide responses to the following in writing, electronically, and serve the above-named party on or before the date specified to [dhunnell@ors.sc.gov](mailto:dhunnell@ors.sc.gov). In addition to a signature and verification at the close of the Company's responses, please indicate the Company witness(es), employee(s), or agent(s) responsible for the information contained in each response.

Pursuant to S.C. Code Ann. §§ 58-4-55 (Supp. 2018) and 58-5-230 the South Carolina Office of Regulatory Staff hereby makes the following request(s):

PUI's amended application states "Applicant proposes that it be permitted to limit its liability and that of its agents and employees to customers for damages arising out of the interruption of service or the failure to furnish service to the remedies provided in S.C. Code Regs. 103-517 (2012)." (Company amended this text to cite S.C. Code Reg. 103-514 as the correct regulation in its response to Water Operations Request No. 14).

Please confirm or deny that the Company agrees that by way of its request to add the limit of liability language to its tariff that it is not seeking a waiver of its obligations established by S.C. Code Regs 103-535, 103-551, and 103-571, which regulates interruption of service and that the Company intends to continue to fully comply with these regulations.

Please confirm or deny that the Company agrees that by way of its request to add the limit of liability language to its tariff that it is not seeking a waiver of its obligations established by the Commissions regulations concerning Customer Relations established in Chapter 103; Article 5, Sub article 4 and that the Company intends to continue to fully comply with these regulations.

Thank you,  
Daniel Hunnell II  
803.737.0780